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5 6 7	hstoberski@duanemorris.com Attorneys for Defendant, U.S. Bank National Association	
8	UNITED STATES DISTRICT COURT	
9	DISTRICT OF NEVADA	
10 11	JACYL D. TACANG,	Case No.: 2:18-cv-01431-JCM-CWH
12	Plaintiff, v.	STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANT U.S.
13	U.S. BANK HOME MORTGAGE,	BANK NATIONAL ASSOCIATION TO ANSWER OR RESPOND TO PLAINTIFF'S COMPLAINT
14	Defendant.	(Second Request)
15		Current Due Date: October 1, 2018
16		New Due Date: October 1, 2018
17		
18	Defendant U.S. Bank National Association (sued herein as "U.S. Bank Home Mortgage"	
19	("U.S. Bank") and plaintiff Jacyl D. Tacang ("Plaintiff") by and through her counsel of record	
20	hereby stipulate and agree as follows:	
21	RECITALS	
22	WHEREAS on August 2, 2018, Plaintiff filed her Complaint in this action with this Court;	
23	WHEREAS on August 9, 2018, Plaintiff caused the Complaint to be served on U.S. Bank;	
24	WHEREAS, the parties' First Stipular	tion to Extend Time to October 1, 2018, for U.S. Bank
25	to Answer or Respond to Plaintiff's Compla	aint, was approved by the Court on August 20, 2018
26	[ECF No. 6].	
27	WHEREAS, Plaintiff and U.S. Bank	are engaged in good faith early settlement discussions,
28	which may resolve this matter;	

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1	WHEREAS, this is the second mutual stipulation by the parties to extend the time for U.S.
2	Bank to answer or respond to Plaintiff's Complaint;
3	WHEREAS, pursuant to LR IA 6-1(a) and LR II 7-1, Plaintiff and U.S. Bank have agreed to
4	extend U.S. Bank's deadline to respond to the Complaint for a period not greater than twenty-one
5	days, from October 1, 2018, to October 22, 2018.
6	IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN THE PARTIES
7	AS FOLLOWS:
8	U.S. Bank's deadline to respond to the Complaint is extended to October 22, 2018.
9	IT IS SO STIPULATED.
10	DATED: September 21, 2018 HAINES & KRIEGER, LLC
11	Byr /s/ Chawn W Millon
12	By: <u>/s/ Shawn W. Miller</u> David H. Krieger (SBN 9086) Shawn W. Miller (SBN: 7825)
13	8985 S. Eastern Ave., Suite 350 Henderson, NV 89123
14	Attorneys for Plaintiff JACYL D. TACANG
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16	DATED: September 21, 2018 DUANE MORRIS LLP
17	By: <u>/s/ Holly S. Stoberski, Esq.</u> Dominica C. Anderson (SBN 2988)
18	Holly S. Stoberski (SBN 5490)
19	Attorneys for Defendant U.S. BANK NATIONAL ASSOCIATION
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22	[PROPOSED] ORDER
23	Good cause appearing, the deadline for defendant U.S. Bank to answer or respond to the
24	Complaint of plaintiff Jacyl D. Tacang is extended to October 22, 2018.
25	IT IS SO ORDERED.
26	Dated: September 25, 2018
27	United States Magistrate Judge
28	

CERTIFICATE OF SERVICE

1		CERTIFICATE OF SERVICE
2	1.	On September 21, 2018, I served the following document(s):
3		STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANT U.S. BANK NATIONAL ASSOCIATION TO ANSWER OR RESPOND TO PLAINTIFF'S
4		COMPLAINT (SECOND REQUEST)
5	2.	I served the above-named document by the following means to the persons listed below:
6		BY electronic transmission through the CM/EFC filing system of the United States District Court, District of Nevada.
7		David H. Krieger
8		Shawn W. Miller HAINES & KRIEGER, LLC
9		8985 S. Eastern Ave., Suite 350 Henderson, NV 89123
10		Attorneys for Plaintiff Jacyl D. Tacang Email: dkrieger@hainesandkrieger.com
11		BY Mail: I am "readily familiar" with the firm's practice of collection and
12		processing correspondence for mailing and electronic service. Under that practice it would be deposited with the U.S. postal service on that same day with postage
13		thereon fully prepaid at Las Vegas, Nevada, in the ordinary course of business, and also served via electronic mail.
14		T. I. I. I. C. C. destate Constitution and constitution
15	3.	I declare under penalty of perjury that the foregoing is true and correct.
16		SIGNED: September 21, 2018
17		Jana Dailey /s/ Jana Dailey
18		(Name of Declarant) (Signature of Declarant)
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